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Office of the Secretary
Federal Communications Commission
1919 M Street, Room 222
Washington, D.C. 20554

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OCT 25 1996
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Re: *In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 9-1-1 Emergency Calling Systems*, CC Docket No. 94-102

Dear Commission Secretary,

Enclosed is an original and nine (9) copies of Reply Comments from SCC Communications Corporation to Comments submitted on the Further Notice of Proposed Rulemaking for CC Docket No. 94-102. Please distribute the filing as appropriate.

Thank you for your attention to this matter.

Sincerely,

C. Eric Sorensen
Product Marketing Manager

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC

In the Matter of	)	
	)	
Revision of the Commission's Rules	)	CC Docket No. 94-102
To ensure Compatibility with	)	
Enhanced 911 Emergency Calling Systems	)	

The following Reply Comments are submitted by SCC Communications Corporation, Boulder, Colorado.

Introduction

SCC Communications Corporation is a leader in the innovation and delivery of database services and software solutions for the telecommunications and public safety industries throughout North America. SCC has been an active participant in industry efforts to bring the benefits of Enhanced 9-1-1 to wireless subscribers through-out the United States.

Delivery of 9-1-1 calls from non-code identified wireless devices

In the Report and Order, the Commission required that covered carriers must process all 9-1-1 wireless calls which do not transmit a Code Identification where requested by the administrator of the designated Public Safety Answering Point. This ruling created two major issues for provisioning of wireless 9-1-1 service. The first being the impact of delivering these calls to the PSAP and the second being the impact to covered carriers of giving PSAPs the option of accepting or not accepting these 9-1-1 calls.

Allowing non-code identified wireless devices to make 9-1-1 calls opens the door to increased prank calls and fraudulent use of 9-1-1. SCC supports the comments submitted by 360° Communications Company where they state, "requiring wireless carriers to process such calls is not in the public interest because it makes call back impossible, encourages fraudulent and crank calls,...and creates a free rider problem." (10/25/96, ¶4) Broad application of this rule could be taken so far as to begin a new market in selling "old or used" wireless phones, simply for use in reaching 9-1-1 without having to pay for carriers' service or any imposed 9-1-1 surcharge.

SCC does not agree with the Commission's analogy of non-code identified devices being comparable to a coin phone. The State of New Jersey Office of Emergency Telecommunications Services (OETS), describes a more accurate analogy of a pay-phone that is connected to a line not activated by the local exchange carrier. Granting that wireless/radio transmitted services are different in capabilities from wireline, SCC believes that imposition of this requirement on wireless carriers is not reasonable and goes well beyond parity of service with wireline 9-1-1.

It is apparent that the Commission was attempting to provide public safety agencies with as much flexibility as possible by allowing them to choose whether or not to accept 9-1-1 calls from non-code identified devices. However, SCC feels that the net affect of this decision introduces public confusion about where and when wireless 9-1-1 access is available and imposes significant call routing and delivery issues on the covered carriers. If non-code identified devices are allowed to access 9-1-1, it should be provided on a ubiquitous basis, not a PSAP by PSAP deployment.

How might covered carriers continue to upgrade and improve 9-1-1 services to increase its accuracy, availability, and reliability?

Several areas of improvements for wireless 9-1-1 were identified as part of the initial Joint Experts Meetings held in 1994. Many of these areas have subsequently been dropped or "pushed aside" so that a focus can be had on the immediate requirements for deployment of wireless 9-1-1 service. SCC feels that in future proceedings, the Commission may want to consider the following upgrades or improvements for wireless 9-1-1:

Defined Network Grade of Service

An overarching objective of the efforts around wireless 9-1-1 has been to reach or exceed parity with wireline 9-1-1 services. Keeping with this theme, the Commission may want to consider defining the minimum performance required for network grade of service for wireless 9-1-1 calls. This would provide carriers and PSAPs alike, a benchmark to engineer to and monitor their networks for compliance. Currently in wireline E9-1-1 networks, a P.01 grade of service is commonly required.

Handset Modifications

Although not required for initial deployments of wireless 9-1-1, certain modifications to wireless devices could enhance access to 9-1-1 service. The proposal that handset locking mechanisms be modified to allow 9-1-1 calls, even when locked, is an example of these types of modifications.

Subscriber Identification

An original requirement from the JEM was to identify the subscriber calling 9-1-1. This feature is provided with wireline 9-1-1 and supports public safety agencies in immediate response to emergencies, as well in after call follow up efforts. SCC believes that providing wireless subscriber information will provide improved service for wireless subscribers and support improved responses for public safety agencies.

Should covered carriers be required to provide improved location services beyond those in the current ruling?

The Commission seeks comments on a minimum "latency period" for identifying the location of a wireless 9-1-1 caller and providing that information to the E9-1-1 infrastructure. Location of the wireless caller should be used to determine routing of the 9-1-1 caller to the appropriate PSAP. PSAPs depend on the selective routing function of an E9-1-1 network to get 9-1-1 calls to the correct agency for an emergency response. Delivery of 9-1-1 calls to a wrong PSAP, even with great caller location information, introduces critical delay in sending appropriate emergency aid.

Accordingly, SCC supports the "latency" targets submitted by APCO, NENA, and NASNA (Joint Commenters). A maximum of delay of one or two seconds with a starting requirement of five seconds until technology matures. This position was supported by several commenters, including Associated RT, Inc., and seems entirely reasonable for Phase Two deployment objectives.

Routing of wireless 9-1-1 calls to the "appropriate" or "designated" PSAP raised some questions during earlier comment submissions to the Commission. Determination of routing for wireline 9-1-1 calls is accomplished regularly across the country. The same process of establishing appropriate call routing for wireless 9-1-1 calls can reasonably be applied. Effectively, public safety agencies determine what areas are supported by which agency and supply this input to carriers for application within their networks. SCC is confident that this approach will be supported by public safety for the wireless networks, as it is for wireline.

The Commission also sought comments on the potential of improving the accuracy of location information for wireless 9-1-1. An expanded target of accuracy to 40 feet 90% of the time was suggested as a new five year goal. SCC believes that obtaining the level of accuracy currently in the Report and Order will be difficult in many areas in the five year timeframe. However, changes in technology have been so dramatic in recent years that even the suggested new target could be obtainable. In this area, SCC supports the comments from Lucent Technologies Inc. where they suggest that the Commission might "use actual experience and empirical evidence to evaluate the merits of various alternatives prior to mandating any specific standard."

How can a consumer education program be addressed?

Consumer education for use of 9-1-1 is an issue addressed across the nation for public safety. The model established in wireline 9-1-1 clearly demonstrates a cooperative effort between public safety, local exchange carriers, and commercial entities, of developing and disseminating public information on 9-1-1. One instance of this cooperative participation is the "9-1-1 for Kids" education program.

While it is true that levels of 9-1-1 service will differ from area to area, many basic 9-1-1 educational programs can be implemented by wireless carriers to support the public safety agencies within their home areas. At a minimum, wireless carriers should notify subscribers within their home areas of the level of 9-1-1 service that is available. As stated by the Texas ACSEC, "the wireless industry has been heavily promoting public safety benefits of wireless service for many years."

Additional Issues

Designation of 9-1-1 as Dialed Digits

In the original Report and Order, the Commission stated, "Regarding a dialing standard for placing a 9-1-1 call, we agree with GTE that we should not adopt a rule requiring any particular dialing pattern for 9-1-1 access." SCC believes that the Commission's intent in this statement was to allow for differences in design of wireless devices (i.e. Send keys vs. Speed Dial buttons, etc.). However, SCC feels it is important that the Commission acknowledge that the digits 9-1-1 are

specifically established as the number to dial for access to emergency services. Access to 9-1-1 should be available without the requirement for use of special keys, such as '*' or '#.'

Cost Recovery for E9-1-1 Investments

While SCC understands the concerns expressed by many parties relative to cost recovery for E9-1-1 investments, it seems clear that precedents have been set in the wireline 9-1-1 environment. 9-1-1 service is provided to public safety agencies by local exchange carriers and other vendors for an agreed upon level of compensation. State and local agencies have established various methods of raising the funds required to purchase these services. The application of the same methods should be appropriate to wireless 9-1-1 service providers, as well. Once again, parity with the wireline service will be sufficient to support this requirement. The Commission may wish to encourage wireless carriers to work cooperatively with their state and local agencies to modify current statutes or agreements to accommodate wireless 9-1-1 services.

Conclusion

In conclusion, SCC would like to applaud the Commission for their efforts to establish wireless 9-1-1 service for the betterment of the American public. The Report and Order lays out a path of deployment requirements that are generally reasonable and achievable. SCC would encourage the Commission to stay abreast of progress made toward compliance with the Report and Order. The Commission provided for a tremendous amount of flexibility within their ruling, expecting that industry and public safety would work in a spirit of cooperation. Hopefully the spirit of the Commission's initiative will prevail and not become a "minimalist" approach when actual development and deployment begins. Clearly, some of the objectives established within the five year goal can be accomplished sooner, if participants drive to meet the true public safety requirements of their subscribers.

Respectfully Submitted,

George Heinrichs

George Heinrichs
President
SCC Communications Corp